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# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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October 19, 2010

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 27 Oct 2010*

FROM: Kevin Lundmark, Hydrologist & Lead *KWL*

RE: Roads D, F & L, Sunnyside Cogeneration Associates, Star Point Waste Fuel, C/007/0042, Task ID #3653

### SUMMARY:

On August 2, 2010 the Division received a permit amendment to designate three roads as "Primary Roads" at the Star Point Waste Fuel site. Proposed Primary Roads D, F and L are intended for regular and ongoing use by haul trucks at the site. The proposed primary roads are located in the northwest permit boundary area.

This memo presents the analysis of the permit amendment relative to hydrology requirements of the State of Utah R645 Coal Mining Rules. Upon review of the amendment, the Division finds that additional information is necessary in order to comply with the State of Utah R645 Coal Mining Rules. The Permittee must address the following deficiency prior to Division approval:

**R645-301-742.423** The Permittee must revise the MRP amendment to correctly and clearly contain the following information:

- Correct Table 742a to identify a 10-year 24-hour design storm event for diversion ditches not associated with the refuse pile, thereby making Table 742a consistent with the design storm events described in the text of Section 742 (page 7-33);
- Clearly identify primary roads D, F, L and Haul Road on MRP Maps 731.720a and 731.720b such that primary roads are discernable from ancillary roads (secondary roads/trails) at the site.

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 784.24, 817.15; R645-301-742.

**Analysis:**

**Road Drainage**

According to Section 5 of the MRP, the only primary road currently existing at the site is the Haul Road. Drainages, drainage control features (culverts, diversions) and primary roads are reportedly shown on MRP Maps 731.720a and/or 731.720b; however, primary roads are not discernable from ancillary roads on Maps 731.720a and 731.720b. Utah coal rule R645-301-742.423 identifies the requirements for drainage control for primary roads, including the design requirement for primary roads to safely pass the peak runoff from a 10-year, 6-hour precipitation event. Drainage design calculations are presented in Section 742 of the MRP, including drainage control for primary roads D, F, L and Haul Road. The Diversion Ditch Design Data in Table 742a identifies a 25-year 24-hour design event for diversions not associated with the refuse pile; however, the text of Section 742 (page 7-33) indicates a 10-year 24-hour design event for these diversions.

**Findings:**

The amendment does not meet the minimum Hydrologic Information requirements of the State of Utah R645 Coal Mining Rules and should not be approved. Prior to the Division approving the application, the following deficiency must be addressed:

**R645-301-742.423** The Permittee must revise the MRP amendment to correctly and clearly contain the following information:

- Correct Table 742a to identify a 10-year 24-hour design storm event for diversion ditches not associated with the refuse pile, thereby making Table 742a consistent with the design storm events described in the text of Section 742 (page 7-33);
- Clearly identify primary roads D, F, L and Haul Road on MRP Maps 731.720a and 731.720b such that primary roads are discernable from ancillary roads (secondary roads/trails) at the site.

**RECOMMENDATIONS:**

The application does not meet the requirements of the State of Utah R645 Coal Mining Rules. The Permittee must address the deficiency identified above prior to obtaining Division approval.

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